

Amy F. Sorenson, Esq. (Nevada Bar No. 12495)
Jennifer R. Hargis, Esq. (Nevada Bar No. 11392)
Michael L. Iosua, Esq. (Nevada Bar No. 11820)
SNELL & WILMER L.L.P.
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, NV 89169
Telephone (702) 784-5200
Facsimile (702) 784-5252
Email: asorenson@swlaw.com
jhargis@swlaw.com
miosua@swlaw.com

*Attorneys for Defendants Wells Fargo Bank, N.A., sued
here as Wells Fargo Home Loan Servicing LP,
MERSCORP, Inc. and Mortgage Electronic
Registration Systems, Inc.*

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

QIANG GUO MAI;
YAN MEI MAI, an individual,

Plaintiffs,

vs.

WELLS FARGO HOME LOAN
SERVICING LP; MERSCORP, INC., a
Virginia Corporation; MORTGAGE
ELECTRONIC REGISTRATION
SYSTEMS, INC, a Subsidiary of
MERSCORP, Inc., a Delaware
Corporation; AND DOES individuals 1 to
100, Inclusive; and ROES Corporation 1 to
30, Inclusive; and all other persons and
entities Unknown claiming any right, title
estate, lien Or interest in the real property
described in the Complaint adverse to
Plaintiff's ownership, or Any cloud upon
Plaintiff's title thereto

Defendants.

No: 2:11-cv-01530-KJD-PAL

**EMERGENCY MOTION TO EXTEND THE
TIME FOR DEFENDANTS TO FILE THEIR
REPLY IN SUPPORT OF MOTION FOR
SUMMARY JUDGMENT AND
OPPOSITION TO COUNTERMOTION TO
NAME ROE CORP. 1 AND 2**

(First Request)

Pursuant to Local Rule 6-1 Defendants Wells Fargo Bank, N.A., named as Wells Fargo Home Loan Servicing LP ("Wells Fargo"), MERSCORP, Inc. and Mortgage Electronic Registration Systems, Inc. (collectively, "Defendants"), by and through their counsel, the law firm of Snell & Wilmer L.L.P., move this Court for an order granting Defendants a 10-day

1 extension of time to file a reply in support of Defendants' motion for summary judgment filed on
 2 April 20, 2012 and opposition to Plaintiffs' countermotion to name Roe Corp. 1 and 2 filed on
 3 April 25, 2012.

4 On April 20, 2012, Defendants filed their motion for summary judgment with respect to
 5 Plaintiffs' original complaint ("Complaint"). (ECF 46.) On April 25, 2012, the Court permitted
 6 Plaintiffs to amend their Complaint and file a First Amended Complaint ("FAC"). (See ECF 48,
 7 49.) As a result of the FAC, Plaintiffs' claims have changed and Defendants are evaluating the
 8 amended claims and whether any settlement opportunities may be available.

9 Plaintiffs have also filed a countermotion to further amend their claims as asserted in the
 10 FAC. Additional time is also needed to evaluate how the proposed amendments may affect the
 11 claims against Defendants.

12 Defendants' counsel has contacted Plaintiffs regarding a stipulation to extend the time for
 13 evaluation and settlement purposes. However, consistent with their previous actions, Plaintiffs
 14 have not responded to Defendants' counsel's attempts to contact them.

15 WHEREFORE, Defendants respectfully request that the Court grant this emergency
 16 motion to extend the time and order Defendants file their reply in support of motion for summary
 17 judgment, as well as their response to Plaintiffs' countermotion to name Roe Corp. 1 and 2, on or
 18 before May 24, 2012.

19 Dated: May 11, 2012. SNELL & WILMER L.L.P.

20
 21 By: 

Amy F. Sorenson, Esq.

Jennifer R. Hargis, Esq.

Michael L. Iosua, Esq.


3883 Howard Hughes Parkway, Suite 1100
 Las Vegas, Nevada 89169

*Attorneys for Defendants Wells Fargo Bank, N.A.,
 sued here as Wells Fargo Home Loan Servicing LP,
 MERSCORP, Inc. and Mortgage Electronic
 Registration Systems, Inc.*

ORDER

IT IS SO ORDERED that Defendants shall be given a 10-day extension to file their reply in support of motion for summary judgment, as well as their response to Plaintiffs' countermotion to name Roe Corp. 1 and 2, up to and including May 24, 2012.

IT IS SO ORDERED.




UNITED STATES DISTRICT JUDGE

DATED: May 14, 2012

Submitted by:

SNELL & WILMER L.L.P.

By:



Amy F. Sorensen, Esq.
Jennifer R. Hargis, Esq.
Michael L. Iosua, Esq.
3883 Howard Hughes Parkway
Suite 1100
Las Vegas, NV 89169

Snell & Wilmer

LLP
LAW OFFICES
3883 HOWARD HUGHES PARKWAY, SUITE 1100
LAS VEGAS, NEVADA 89169
(702)784-5200